

## **Code of Practices and Procedures to be followed for Fair Disclosure of Unpublished Price Sensitive Information**

The Company with intent to achieve the Principles of Fair Disclosure for purposes of Code of Practices & Procedures for Fair Disclosure of Unpublished Price Sensitive Information, pursuant to sub-regulation (1) of regulation 8, as envisaged under the SEBI (Prohibition of Insider Trading) Regulations, 2015 (“Regulations”) will adhere to the following:

1. To make, prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such information generally available.
2. To make, uniform and universal dissemination of unpublished price sensitive information, with intent to avoid selective disclosures.
3. The Company Secretary and Compliance Officer of the Company will be the Chief Investor Relations Officer to deal with dissemination of information and disclosures of unpublished price sensitive information.
4. To ensure, prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently, or otherwise to make such information generally available.
5. To provide appropriate and fair response to queries on news reports and requests for verification on market rumours by regulatory authorities.
6. The Company will ensure that, information if any, shared with analysts and research personnel is not unpublished price sensitive information.
7. The Company will constantly endeavour to develop best practices to make transcripts and records of proceedings of meetings with analysts and other investor relations conferences on the official website ([www.sekuritindia.com](http://www.sekuritindia.com)) to ensure official confirmation and documentation of disclosures made.
8. To handle all unpublished price sensitive information on a need-to-know basis.

### **Policy on legitimate purpose**

An insider shall not communicate, provide or allow access to or procure any unpublished price sensitive information relating to the Company or its securities, to or by any person including other insiders except where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

Legitimate purpose may include sharing of unpublished price sensitive information in the ordinary course of business by an insider with partners, collaborators, lenders, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants, provided that such sharing has not been carried out to evade or circumvent the prohibitions of the Regulations.